

# **EXHIBIT D**



Evan Talley <etalley@dunlapcoddng.com>

**Re: Terves v. Yueyang; Our Docket No. 2189.001**

Cavanagh, Matthew J. <mcavanagh@mcdonaldhopkins.com>

Thu, Oct 17, 2019 at 2:19 PM

To: Evan Talley <etalley@dunlapcoding.com>, "Cupar, David B." <dcupar@mcdonaldhopkins.com>

Cc: Julie Oseland <joseland@dunlapcoddng.com>, Ecometal/Yuan Patent Infringement Litigation <ecometal-lit@dunlapcoddng.com>

Evan,

Attached is a draft protective order for your review. This is based on the ND of Ohio's standard order for patent cases, which you reference in your email. The redlines show the proposed changes to the standard protective order.

Let me know if you have any edits, questions, or want to discuss further.

Thanks,

Matt

**Matt Cavanagh**  
Member

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**From:** Evan Talley [mailto:[etalley@dunlapcoddington.com](mailto:etalley@dunlapcoddington.com)]  
**Sent:** Monday, October 14, 2019 3:34 PM  
**To:** Cavanagh, Matthew J.; Cupar, David B.  
**Cc:** Julie Oseland; Ecometal/Yuan Patent Infringement Litigation  
**Subject:** Re: Terves v. Yuevang; Our Docket No. 2189.001

Matt and David -

As the parties have already commenced discovery, we should discuss the protective order to be entered in this case. I note Exhibit A to the local patent rules is a form protective order for patent cases. I assume that's where Plaintiff intends to start. Either way, let me know when we can expect a draft.

We should also begin discussing availability for the Rule 26 conference.

Evan

Evan W. Talley, Esq.

Dunlap Codding P.C.  
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609 W. Sheridan Avenue  
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My paralegal is Julie Oseland. Please feel free to contact her at [joseland@dunlapcoddng.com](mailto:joseland@dunlapcoddng.com) or 405-607-8600 if you need additional assistance.

We invite you to visit DC on Film Row – our free community and arts space in the heart of Oklahoma City. [www.dcfilmrow.com](http://www.dcfilmrow.com)

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On Mon, Oct 7, 2019 at 1:31 PM Cavanagh, Matthew J. <[mcavanagh@mcdonaldhopkins.com](mailto:mcavanagh@mcdonaldhopkins.com)> wrote:

**Matt Cavanagh**  
Member

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**From:** Julie Oseland [mailto:[joseland@dunlapcoddng.com](mailto:joseland@dunlapcoddng.com)]  
**Sent:** Monday, October 07, 2019 2:21 PM  
**To:** Cavanagh, Matthew J.  
**Cc:** Ecometal/Yuan Patent Infringement Litigation  
**Subject:** Terves v. Yueyang; Our Docket No. 21859.001

Good afternoon,

We are in receipt of interrogatories and requests for production of documents to both Defendants. Could you please forward a Word version of each of these documents at your convenience.

Thank you.

Julie

Julie Oseland, CP  
Community Outreach Director  
DUNLAP CODDING, P.C.  
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